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Cc: Forney, Lisa[Iforney@pa.gov]

From: Zaccano, Robert

Sent: Wed 7/29/2015 4:51:48 PM

Subject: K40 answer

Lisa and I collaborated on a response:

The Department is aware of three (3) loads of waste originating at Miller Chemical that alarmed the radiation meters at landfills. The first load entered Modern Landfill on July 2, 2015. Modern Landfill staff in turn surveyed the load and determined that the load contained Potassium-40 (⁴⁰K), which is classified as TENORM (Technologically Enhanced Naturally Occurring Radioactive Material). The second and third loads entered Mountain View Landfill on July 3, 2015. Again, staff surveyed the loads and determined that the loads contained ⁴⁰K.

TENORM is naturally occurring radioactive material not specifically subject to regulation under state and federal laws. TENORM has the potential to result in human exposure when the natural environment is disturbed by human activities. The isotope identified in waste from Miller Chemical, ⁴⁰K, is both naturally occurring and commonly found in nature as it is the largest source of natural radioactivity found in animals including humans. It has a long half-life of 1.25 billion years. Given its overall abundance and long half-life, it is not unusual for raw materials used by industry to contain ⁴⁰K. Similarly, it is quite normal for the water intakes to naturally have ⁴⁰K at some detectable level.

Given the complex clean-up taking place at Miller Chemical, the Department requested that both Modern Landfill and Mountain View Landfill submit an application to the Waste Management Program for a Form U approval to bury the waste. Both facilities agreed to begin the process and obtain a Form U approval. In addition, the Department discussed proper waste characterization, analysis and disposal options with Miller Chemical representatives. It is the understanding of the Department that they have conducted radiologic surveys as waste is generated to determine if any other unusually high concentrations of ⁴⁰K exist. However, we have not been informed of any additional occurrences.

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Effective July 1, 2014, the 24-hour toll free Emergency Response number for SCRO will be: 866-825-0208